

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

EL NUEVO DIA, INC. Plaintiff Vs. UNITED STEELWORKERS OF AMERICA, AFL-CIO-CLC. Defendant	CIVIL NO. 98-1546(JP)
--	-----------------------

**FOR AN EXTENSION OF TIME TO FILE AN OPPOSITION TO “MOTION
SEEKING RELIEF FROM JUDGMENT AND TO ALLOW PLAINTIFF
TO FILE AN OPPOSITION TO DEFENDANT’S MOTION
FOR SUMMARY JUDGMENT”**

TO THE HONORABLE COURT:

COMES NOW defendant, **United Steelworkers of America, AFL-CIO-CLC**, through its undersigned attorneys, the law firm of **TRONCOSO & SCHELL**, and very respectfully state and pray as follows:

On or about October 12, 2004, plaintiff filed a “Motion Seeking Relief from Judgment and to Allow Plaintiff to File an Opposition to Defendant’s Motion for Summary Judgment”. Defendant United Steelworkers of America, AFL-CIO-CLC, understands that the averments set forth in its motion are incorrect and intends to file an opposition thereto.

However, the ten (10) days set forth in Local Rule 7.1 for defendant to file its

opposition to plaintiff's a "Motion Seeking Relief from Judgment and to Allow Plaintiff to File an Opposition to Defendant's Motion for Summary Judgment", is set to expire on October 26, 2004. In this regard, defendant requests a ten (10) day extension of time to file its opposition to plaintiff's motion, which is set to expire on November 9, 2004.

WHEREFORE, it is very respectfully requested that this Honorable Court grant defendant United Steelworkers of America, AFL-CIO-CLC, until November 9, 2004, to file its opposition to the "Motion Seeking Relief from Judgment and to Allow Plaintiff to File an Opposition to Defendant's Motion for Summary Judgment", filed by plaintiff El Nuevo Día, Inc.

In San Juan, Puerto Rico, this 25th day of October 2004.

I HEREBY CERTIFY: That on October 25, 2004, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Alicia Figueroa-Llinas, Esq., and Pedro J. Manzano-Yates, Esq.

s/RICHARD SCHELL-ASAD
RICHARD SCHELL-ASAD - BAR NO. 203207
PLAINTIFFS' COUNSEL
TRONCOSO & SCHELL
P.O. BOX 9023352
SAN JUAN, PR 00902-3352
TEL: (787) 722-0741
FAX: (787) 724-2563
e-mail: rschell@troncosolaw.com